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10 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

11 Lilia Elizabeth Haller, } Case No. 1:22-cv-01050-JLT-GSA  
12 Plaintiff, } STIPULATION AND ORDER FOR  
13 } EXTENSION OF TIME  
14 vs. }  
15 Kilolo Kijakazi, Acting }  
16 Commissioner of Social Security, }  
17 Defendant. }  
18  
19

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21 IT IS HEREBY STIPULATED, by and between the parties through their  
22 respective counsel of record, with the Court's approval, that Plaintiff shall have a  
23 45-day extension of time, from January 31, 2023 to March 17, 2023, for Plaintiff to  
24 serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates  
25 in the Court's Scheduling Order shall be extended accordingly.

26 This is Plaintiff's second request for an extension of time. Good cause  
27 exists for the requested extension. For the weeks of January 31, 2023 and February  
28

1 6, 2023, Counsel currently has 32 merit briefs, and several letter briefs and reply  
2 briefs. Additional time is needed to thoroughly brief this matter for the Court.

3 Counsel for Plaintiff is currently taking partial leave as his child was born on  
4 October 14, 2022. Thus, Counsel is working limited hours for the months of  
5 December 2022 through March 2023 (with a possible extension of parental leave).

6 Defendant does not oppose the requested extension. Counsel apologizes to  
7 the Defendant and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: January 26, 2023 PENA & BROMBERG, ATTORNEYS AT LAW  
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12 By: /s/ Jonathan Omar Pena  
13 JONATHAN OMAR PENA  
14 Attorneys for Plaintiff

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16 Dated: December \_\_, 2022 PHILLIP A. TALBERT  
17 United States Attorney  
18 MATHEW W. PILE  
19 Associate General Counsel  
20 Office of Program Litigation  
Social Security Administration

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22 By: \*/s/ Ellinor R. Coder  
23 Ellinor R. Coder  
24 Special Assistant United States Attorney  
25 Attorneys for Defendant  
(\*As authorized by email on Jan. 26, 2023)  
26  
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## ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: January 27, 2023

/s/ Gary S. Austin

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UNITED STATES MAGISTRATE JUDGE